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Attorneys for Plaintiffs ROSAURA DERAS,  
ALEXANDER SANTIAGO, and MARIA ELENA  
SANTIAGO, individually and on behalf of a class of  
similarly situated individuals

**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

ROSAURA DERAS, ALEXANDER  
SANTIAGO, and MARIA ELENA SANTIAGO,  
individually and on behalf of a class of similarly  
situated individuals,

Plaintiffs,

v.

VOLKSWAGEN GROUP OF AMERICA, INC.,  
Defendant.

Case No.: 4:17-cv-05452 (JST)(TSH)

**Hon. Jon S. Tigar**

**JOINT CASE MANAGEMENT  
CONFERENCE STATEMENT**

Plaintiffs Rosaura Deras, Alexander Santiago and Maria Elena Santiago (“Plaintiffs”), and  
Defendant Volkswagen Group of America, Inc. (“VWGoA” or “Defendant”), pursuant to the  
Court’s June 12, 2020 Order, hereby respectfully submit the following Joint Case Management  
Conference Statement. The phone number for the September 23, 2020 telephone conference is

(866) 384-1728; passcode: 2124718466.

**1. STATUS OF PROPOUNDED DISCOVERY**

Plaintiffs have served three sets each of Requests for Production of Documents and Interrogatories. VWGoA has responded to the first two sets, and has provided supplemental responses to the first request to produce and to the first set of interrogatories.

VWGoA has served one set of Requests for Production of Documents, and one set of Interrogatories. Plaintiffs have responded to VWGoA's requests for documents, and have provided supplemental interrogatory answers. VWGoA has conducted an inspection of Plaintiff Santiago's vehicle, and the sunroof assembly from that vehicle has been removed and is being preserved jointly by Plaintiffs and Defendant.

There are no pending discovery disputes at this time.

**2. OTHER ISSUES BEARING ON THE PROGRESS OF THE CASE**

The parties are not aware of any other issues at this time requiring the Court's attention.

Dated: September 23, 2020

THE LAW OFFICE OF STEPHEN M. HARRIS, P.C.

By: /S/ Stephen M. Harris  
Stephen M. Harris  
Attorneys for Plaintiffs  
ROSAURA DERAS, ALEXANDER  
SANTIAGO, and MARIA ELENA  
SANTIAGO, individually, and on  
behalf of a class of similarly situated  
individuals

Dated: September 23, 2020

HERZFELD & RUBIN, P.C.

By: /S/ Brian T. Carr  
Michael B. Gallub  
Homer B. Ramsey  
Brian T. Carr  
(Admitted Pro Hac Vice)  
Attorneys for Defendant  
VOLKSWAGEN GROUP OF AMERICA,  
INC.

**Certification of Compliance with N.D. Cal. L.R. 5-1(i)(3) and General Order 45, Section X**

The filing attorney hereby certifies that concurrence in the filing of the document has been obtained from each signatory, in accordance with N.D. Cal. Local Rule 5-1(i)(3) and N.D. Cal. Gen. Order 45, Sec. X(B).